

EXHIBIT 67

30 (b) (6)

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D. [Redacted for PII]

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

-----X

ELIZABETH SINES, et al.,

Plaintiffs,

Civil Action No.

v.

3:17-cv-00072-NKM

JASON KESSLER, et al.,

Defendants.

-----X

30 (b) (6) VIDEOCONFERENCE DEPOSITION OF

DILLON [Redacted for PII]

Scottsburg, Indiana

Tuesday, July 7, 2020

Reported by:

DEBORAH C. FUREY, RPR, CLR, CRI

JOB NO. 181414

30 (b) (5)

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D.

Redacted for PII

July 7, 2020

9:53 a.m.

Videoconference Deposition of DILLON

Redacted for PII

, held remotely, before Deborah C. Furey, a
Registered Professional Reporter, Certified LiveNote
Reporter and Notary Public.

D. [Redacted for PII]

appreciate that.

(Reporter clarification.)

THE WITNESS: Yeah, I can't remember the name of it. It was also started in Texas by a member who broke off several months after Patriot Front broke off. And he was just getting very disgruntled with everything, so he went to start his own, like, little one-man group, and it fizzled out after like a week or so. But I can't remember what he named it. Something ridiculous.

THE COURT REPORTER: Thank you. Your audio was much better there.

THE WITNESS: Yeah.

BY MR. SIEGEL:

Q. Mr. [Redacted for PII], you said Vanguard had suffered severe damages from the Charlottesville rally.

What do you mean by that?

A. Well, what I mean is, you know, our organization -- during the Charlottesville rally, you know, I wasn't -- I wasn't even at Charlottesville, so an individual named Thomas [Redacted for PII] was there, and he was basically in charge

D. [REDACTED]

of the group.

And, you know, he's the one who basically allowed James Fields to just come in and, you know, be a part of the group, even though he wasn't an actual member. So you have all of this media and all of this press, you know, being released, of James Fields being photographed with our group.

And then, you know, the incident happened. And then a lot of flack came down on us because of that. And a lot of guys just -- they just wanted to disappear because they didn't want to be associated with that. They didn't want the -- how can I say this -- they didn't really want the attention in front of, you know, the world media. So, you know, we lost a lot of members after Charlottesville because a lot of guys got scared.

Q. What were they scared of?

A. You know, being -- having their information exposed, you know, losing their jobs, basically how you would say, quote/unquote, dox'd is what they were afraid of.

So especially a lot of individuals that

1 D. [Redacted for PII]

2 right there?

3 A. Yeah.

4 Q. Do you understand he was referring to
5 the Charlottesville 1.0 rally in May?

6 A. Yes.

7 Q. And he also says, "Brandon and Aaron are
8 in contact with the local planners."

9 Do you see that?

10 A. Yes.

11 Q. Who are Brandon and Aaron?

12 A. I can't remember. I mean, I didn't
13 really go by individuals' first names and I tried
14 to forget people's first names quickly. But I
15 want to say --

16 Q. One second. Let me just ask you a
17 question, Mr. [Redacted for PII].

18 Why did you --

19 A. Yeah.

20 Q. -- forget people's first names quickly?

21 A. Well, because I didn't want, you know,
22 to know anything about them. I wanted to keep
23 that kind of anonymity. So if somebody would tell
24 me their name, I would be like, "Hey, I don't want
25 to hear your name. You know, let's just go by

1 D. [Redacted for PII]
2 these handles to maintain that kind of security
3 and anonymity to where, you know, if anything
4 happens, you know, they don't have your
5 information and they only have my information."

6 Q. And this is for other Vanguard members,
7 right?

8 A. Yeah.

9 Q. So you wanted to make sure you didn't
10 have any information about the real identity of
11 the Vanguard members.

12 A. For the most part, yes.

13 Q. Okay. But Brandon and Aaron were
14 Vanguard America members, right?

15 A. Yes. But some individuals would go by
16 their first names.

17 Q. Got you.

18 Who were the local planners that Thomas
19 [Redacted for PII] is referring to?

20 A. I'm assuming the planners of
21 Charlottesville 2.0, which were potentially Nathan
22 Damigo, Richard Spencer, and Elliot Kline.

23 Q. So you understood Thomas was telling you
24 that Brandon and Aaron, who were Vanguard members,
25 were in contact with the other planners of the
[Redacted]

1 D. [Redacted for PII]

2 right?

3 A. Yes.

4 Q. Who made the shields?

5 A. I want to say -- I can't remember his
6 name, but I know it was -- it was one of our
7 members who personally made the shields.

8 Q. Do you know who designed them?

9 A. That would -- it was in conjunction with
10 the individual who made them and Mr. [Redacted for PII].

11 Q. Do you know whose idea it was to create
12 shields?

13 A. We took that idea from a few other
14 organizations, actually, particularly
15 Traditionalist Workers Party, because we saw them
16 with shields, you know.

17 And we said, "Hey, we should probably
18 get those too," you know, to help protect us from
19 rocks and bottles and things like that, objects
20 that were being thrown at us.

21 Q. So you expected there to be some level
22 of violence at the Charlottesville 2.0 rally?

23 A. Oh, absolutely. Of course. I mean, you
24 always expect violence, you know, at any protest.
25 That's why you wear helmets. That's why -- I

1 D. [Redacted for PII]

2 their names?

3 A. No, I never knew all of everybody's
4 names in Vanguard. I would try to maintain that
5 kind of anonymity as much as I could.

6 Q. Understood.

7 There came a point on August 12th where
8 you heard that James Fields ran his car into
9 counter-protestors, right?

10 A. Yes.

11 Q. What was your reaction to hearing that?

12 A. My reaction to hearing that was just
13 kind of, oh, boy, here we go, you know. We had an
14 incident, something happened, and now we are going
15 to really have hell to pay for this, you know.

16 So that -- you know, I basically had
17 to -- our mindsets had to go into mitigation mode,
18 and try to mitigate this, you know, debacle as
19 much as humanly possible.

20 Q. You heard that a woman named Heather
21 [Redacted for PII] was killed and many other people were
22 wounded by Mr. Fields, right?

23 A. Yes.

24 Q. How did you feel about that?

25 A. Well, I felt kind of, you know,
[Redacted]

1 D. [Redacted for PII]

2 A. Yes.

3 Q. And it's dated August 13th, 2017,
4 correct?

5 A. Yeah.

6 Q. So this is the day after the rally?

7 A. Yeah.

8 Q. And, again, do you see at the top of the
9 page, there's two Vanguard members talking about
10 Mr. Fields ramming his car into protestors.

11 Do you see that?

12 A. Yes.

13 Q. If you go to the bottom of the page, you
14 post, "One person died, sheesh! There are
15 315,000,000 more people in this country."

16 Do you see that?

17 A. Yes.

18 Q. So earlier when you said that you felt
19 bad that Heather [Redacted for PII] was killed, you didn't feel
20 bad, did you?

21 A. No, I legitimately felt bad that
22 somebody had to die, you know? Somebody died.
23 It's always a tragedy when somebody dies.

24 But at the same time, I mean, you're at
25 this rally where you know violent -- violence is

1 D. [Redacted for PII]

2 more than likely imminent, so you can't go there
3 expecting to not be potentially injured.

4 So the way I see it is it's kind of like
5 a surfer. A surfer goes out into the ocean and
6 surfs waves. He shouldn't be surprised if he gets
7 attacked by a shark, because he chose to do that.

8 That was that woman's choice, was to go
9 out there, and it was that surfer's choice to go
10 surfing in the ocean with sharks.

11 So it's a tragedy that she had to lose
12 her life, but at the same time, it shouldn't be a
13 surprise to anybody.

14 Q. So the counter-protestors who were
15 attacked by Mr. Fields should not have been
16 surprised that that's what happened because that's
17 what they should have expected at the rally?

18 A. Absolutely. You should always expect
19 the worst situation possible. You expect and you
20 plan for the worst and you hope for the best.
21 That's what you should do.

22 Q. But you said that they should have
23 expected that they would be attacked by one of the
24 people that's protesting to keep the statues
25 there?
[Redacted]

1 D. [REDACTED]

2 members are, right?

3 A. No, I don't. But according to the
4 logistics that Thomas planned, all of the members
5 were supposed to be in communication, and all of
6 those members were supposed to meet up in specific
7 parking garages and exchange shirts at these
8 parking garages.

9 Q. Do you remember giving a deposition
10 previously in this case?

11 A. Yes, I do.

12 Q. Do you remember being asked about the
13 Vanguard uniform during that deposition?

14 A. Somewhat loosely.

15 Q. Do you remember you said it was a white
16 polo with khakis?

17 A. Yes, it was a white polo with khakis.

18 Q. And there was --

19 A. But I remember also stating that a lot
20 of other organizations also wore the white polo
21 with khakis, such as Identity Evropa and a few
22 other organizations.

23 We tried to be -- a lot of the
24 organizations tried to be very, very similar in
25 our uniforms to promote uniformity. The only

1 D. [Redacted for PII]
2 individuals or groups that didn't have these
3 uniforms, I believe, were Traditionalist Workers
4 Party and a few others. But even League of the
5 South, they had khakis with a white polo, but
6 League of the South had their League of the South
7 emblem on it. And you can --

8 Q. Mr. [Redacted for PII] --

9 A. Yes.

10 Q. -- I think you -- listen to the question
11 I'm asking you and answer.

12 A. All right. Okay.

13 Q. Do you remember giving a deposition in
14 this case?

15 A. Yes.

16 Q. And you were asked about the Vanguard
17 uniform during that deposition?

18 A. Yes.

19 Q. You testified that it was a white polo
20 with khakis, right?

21 A. Yes.

22 Q. You did not testify that it was a white
23 polo only that has the Vanguard emblem on it,
24 right?

25 A. Yes.
[Redacted]

1 D. [REDACTED]
2 wanted to be seen in one of our groups,
3 photographed, and then tried to pin an incident on
4 our group.

5 Q. Do you see a user going by the handle
6 "Pizarro-TN7965"?

7 A. Yes.

8 Q. Do you know who that person is?

9 A. No.

10 Q. But they're a Vanguard member, right?

11 A. Yeah.

12 Q. And that person posted, "Alright, but he
13 was surrounded by us? Wouldn't someone have
14 noticed?"

15 Do you see that?

16 A. Yes.

17 Q. Do you understand he's referring to
18 Fields?

19 A. Yes.

20 MR. SIEGEL: Could we go to the next
21 page, please. Scroll down a little bit. A
22 little bit more, please.

23 Q. So do you see the user Pizarro posts,
24 "Because for all its (sic) worth, we fucking
25 killed someone."
[REDACTED]

1 D. [Redacted for PII]

2 Do you see that?

3 A. Yes.

4 Q. So he thought Vanguard killed somebody?

5 A. Yes.

6 Q. Okay. So several of your Vanguard
7 members were disagreeing with your statement that
8 Fields was an infiltrator.

9 A. Well, a lot of Vanguard members didn't
10 know, because a lot of Vanguard members didn't go.
11 Even I didn't know at first because I didn't go,
12 so I had to get my information from Thomas,
13 because he was there and he was in charge.

14 Q. But at this point, you said he was an
15 infiltrator, right?

16 A. Yes. He infiltrated our ranks at
17 Charlottesville, even though he was not a member.
18 He was allowed into our ranks even though he was
19 not a member. So he was an infiltrator.

20 Q. And another --

21 A. He was allowed to infiltrate our ranks.

22 Q. Mr. [Redacted for PII], please listen to my
23 question.

24 Another Vanguard member disagreed with
25 you and said, "We fucking killed someone," right?

1 D. [Redacted for PII]

2 A. Yes.

3 Q. I'd like to go to the next page, please.

4 And continuing on this conversation,
5 then you posted, "That person acted on his own
6 accord and under his own intention."

7 Do you see that?

8 A. Yes.

9 Q. You wrote that?

10 A. Yes.

11 Q. So again you're saying Fields did this
12 on his own?

13 A. Yes. He did.

14 Q. That's what you're telling other
15 members?

16 A. What was that?

17 Q. That's what you're telling other
18 Vanguard members.

19 A. Yes.

20 MR. SIEGEL: And could you go to the
21 next page. I think one more page, please. Go
22 one more message, please, Julie. Thank you.

23 Q. Mr. [Redacted for PII], do you see at the bottom
24 here, the user Pizarro asks you, "So the official
25 story is that he was a plant."

D. [Redacted for PII]

C E R T I F I C A T E

I do hereby certify that I am a Notary Public in good standing; that the aforesaid testimony was taken before me at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

Witness my hand and official seal this 13th day of July, 2020.



Deborah C. Furey, Notary Public

My commission expires 1-11-2021